EXHIBIT A

Proposed Court-Ordered Joint Conference Report

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

JOEL VANGEHLUWE, et al.,

Case No.

Case No.: 2:18-cv-10542-LJM-EAS

Plaintiffs,

Hon. Laurie J. Michelson

Mag. Elizabeth A. Stafford

V.

GOTNEWS, LLC, et. al.

Defendants.

<u>DEFENDANTS GOTNEWS, LLC, AND CHARLES C. JOHNSON, AND PLAINTIFFS' COURT-ORDERED JOINT CONFERENCE REPORT</u>

Plaintiffs, Joel Vangheluwe and Jerome Vangheluwe, and Defendants, GotNews, LLC, and Charles C. Johnson, hereby file the following report in accordance with this Court's May 16, 2018 Order, and pursuant to such order file this Joint Conference Report:

1. On May 16, 2018, the Court ordered Plaintiffs and the defendants to meet and confer—not by email—about the instant controversy. The parties were ordered to discuss the possibility of settlement, thoroughly discuss the bases of any prospective motions to dismiss, and then file a joint report stating the date of the conference, whether the parties have settled their dispute – or whether additional time for settlement discussions are desired, whether the defendant will be filing a motion to dismiss or an answer, and the deadline for any motion to dismiss.

2. Attorney Marc Randazza ("Randazza") and Attorney Andrew Sommerman ("Sommerman") discussed the instant controversy by phone on Tuesday, May 22, 2018, for approximately 30 minutes.

3. Randazza and Sommerman discussed the possibility of settlement, which is confidential pursuant to Fed. R. Evid. 408. GotNews and Joel Vangheluwe have not settled their dispute, and additional time for settlement discussions is not desired. The other three disputes (both plaintiffs against Charles Johnson and Jerome Vangheluwe against GotNews) were resolved by acceptance of offers of judgment.

- 4. Randazza and Sommerman thoroughly discussed the bases of a California Anti-SLAPP motion that Randazza intended to file on behalf of GotNews. The Answer by GotNews was timely filed on June 26, 2018. The Anti-SLAPP motion was filed the same day.
- 5. Plaintiff Joel Vangheluwe's response to that Motion will be filed twenty-one days thereafter.

Dated: June 27, 2018 Respectfully Submitted,

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Herschel P. Fink (Reg. # P13427). JAFFE RAIT HEUER & WEISS, P.C. Grand Park Centre Building 28 W. Adams Ave., Suite 1500 Detroit, MI 48226

Attorneys for Defendants GotNews, LLC & Chares C. Johnson Dated: June 27, 2018 Respectfully submitted,

SOMMERMAN, McCAFFITY & QUESADA, L.L.P.

/s/

Andrew B. Sommerman*
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*Admitted to the Eastern District of Michigan

Case No. 2:18-cv-10542-LJM-EAS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 27, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

Employee,
Randazza Legal Group, PLLC